

GIBNEY, ANTHONY & FLAHERTY, LLP

John Macaluso (JM 2058)

665 Fifth Avenue

New York, New York 10022 Telephone: (212) 688-5151 Facsimile: (212) 688-8315

E-mail: jmacaluso@gibney.com

OF COUNSEL:

Stephen M. Gaffigan

STEPHEN GAFFIGAN, P.A.

312 Southeast 17th Street, 2nd Floor

Ft. Lauderdale, FL 33316 Telephone: (954) 767-4819 Facsimile: (954)767-4821 E-mail: stephen@smgpa.net

Attorneys for Plaintiff CHANEL, INC.

v.

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC., a New York corporation,

Plaintiff,

BRIGITTE C. VAUGHN a/k/a BRIGITTE C. SIERAU a/k/a BRIGIT VAUGHN and BIBI, INC., individually and jointly, d/b/a BIBISBLINGBLING.COM d/b/a d/b/a BIBISBLINGBLING, and Does 1-10,

Defendants.

CASE NO. 07 CV 6057 (NRB)

NOTICE OF MOTION TO **ADMIT COUNSEL** PRO HAC VICE

TO: Opposing Counsel

PLEASE TAKE NOTICE that upon the annexed affidavit of movant in support of this motion and the Certificate(s) of Good Standing annexed thereto we will move this Court before the Honorable Judge Buchwald at the United States Courthouse for the Southern District of New York, pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York for an Order allowing the admission of movant, a member of the firm of Stephen Gaffigan, P.A. and a member in good standing of the Bar of the State of Florida, as attorney pro hac vice to argue or try this case in whole or in part as counsel. There are no pending disciplinary proceedings against me in any State or Federal court.

Dated: December _______, 2007

Respectfully submitted,

GIBNEY, ANTHONY & FLAHERTY LLP

acalys h Macaluso (JM-2085)

orneys for Plaintiff

New York, New York 10022

(212) 688-5151

(212) 688-8315-fax

GIBNEY, ANTHONY & FLAHERTY, LLP
John Macaluso (JM 2058)
665 Fifth Avenue
New York, New York 10022
Telephone: (212) 688-5151
Facsimile: (212) 688-8315
E-mail: jmacaluso@gibney.com

OF COUNSEL: Stephen M. Gaffigan STEPHEN GAFFIGAN, P.A. 312 Southeast 17th Street, 2nd Floor Ft. Lauderdale, FL 33316 Telephone: (954) 767-4819

Telephone: (954) 767-4819 Facsimile: (954) 767-4821 E-mail: stephen@smgpa.net

Attorneys for Plaintiff CHANEL, INC.

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC., a New York corporation,) CASE NO. 07 CV 6057 (NRB)
Plaintiff, v. BRIGITTE C. VAUGHN a/k/a BRIGITTE C. SIERAU a/k/a BRIGIT VAUGHN and BIBI, INC., individually and jointly, d/b/a BIBISBLINGBLING.COM d/b/a d/b/a BIBISBLINGBLING, and Does 1-10,))) AFFIDAVIT OF) STEPHEN M. GAFFIGAN) IN SUPPORT OF MOTION) TO ADMIT COUNSEL) PRO HAC VICE))
Defendants.)))) _)
State of Florida)) ss: County of Broward)	

STEPHEN M. GAFFIGAN, being duly sworn, hereby deposes and says as follows:

- 1. I am a member of the law firm of STEPHEN GAFFIGAN, P.A.
- 2. I submit this affidavit in support of my motion for admission to practice pro hac vice in the above captioned matter.
- 3. As shown in the Certificate(s) of Good Standing annexed hereto, I am a member in good standing of the Bar of the State of Florida.
- 4. There are no pending disciplinary proceedings against me in any State or Federal court.
- 5. Wherefore your affiant respectfully submits that he be permitted to appear as counsel and advocate pro hac vice in this one case.

Dated: December , 2007

Respectfully submitted,

Stephen M. Gaffigar

STEPHEN GAFFIGAN, P.A.

312 Southeast 17th Street, 2nd Floor

Ft. Lauderdale, FL 33316

(954) 767-4819

(954)767-4821-fax

Sworn to before me this

day of December 2007

Notary Public

DIANA CECIL PAYNE
MY COMMISSION # DD504719
EXPIRES: Jan. 8, 2010

(407) 398-0153
Florida Notary Service.com



The Florida Bar

JOHN F. HARKNESS, JR. EXECUTIVE DIRECTOR

651 East Jefferson Street Tallahassee, Florida 32399-2300

850/561-5600 www.FLORIDABAR.org

State of Florida)
County of Leon)

In Re: 25844

Stephen Michael Gaffigan Stephen M. Gaffigan, P.A. 312 S.E. 17th St., Fl. 2 Fort Lauderdale, FL

I HEREBY CERTIFY that I am the duly appointed custodian of membership records of The Florida Bar.

I FURTHER CERTIFY that the records in the office of the Clerk of the Supreme Court of Florida indicate that said attorney was admitted to practice law in the State of Florida on October 2, 1994.

I FURTHER CERTIFY that the records in the office of The Florida Bar indicate that the above attorney is a member of The Florida Bar in good standing.

Dated this _____ day of September, 2007.

Willie Mae Shepherd

Supervisor, Membership Records

The Florida Bar

WMS/lvf3:R10

GIBNEY, ANTHONY & FLAHERTY, LLP
John Macaluso (JM 2058)
665 Fifth Avenue

New York, New York 10022 Telephone: (212) 688-5151 Facsimile: (212) 688-8315

E-mail: jmacaluso@gibney.com

OF COUNSEL:

Stephen M. Gaffigan

STEPHEN GAFFIGAN, P.A.

312 Southeast 17th Street, 2nd Floor

Ft. Lauderdale, FL 33316 Telephone: (954) 767-4819 Facsimile: (954) 767-4821 E-mail: stephen@smgpa.net

Attorneys for Plaintiff CHANEL, INC.

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

CHANEL, INC., a New York corporation,) CASE NO. 07 CV 6057 (NRB)
Plaintiff, v. BRIGITTE C. VAUGHN a/k/a BRIGITTE C. SIERAU a/k/a BRIGIT VAUGHN and BIBI, INC., individually and jointly, d/b/a BIBISBLINGBLING.COM d/b/a d/b/a BIBISBLINGBLING, and Does 1-10, Defendants.))) AFFIDAVIT OF) JOHN MACALUSO) IN SUPPORT OF MOTION) TO ADMIT COUNSEL) STEPHEN M. GAFFIGAN) PRO HAC VICE)))
State of New York) Ounty of New York)	_)

JOHN MACALUSO, being duly sworn, hereby deposes and says as follows:

- 1. I am a partner at Gibney, Anthony & Flaherty, counsel for Plaintiff in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Stephen M. Gaffigan as counsel pro hac vice to represent Plaintiff in this matter.
- 2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1991. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
- 3. I have known Stephen Gaffigan more than five years.
- 4. Mr. Gaffigan is a member in Good Standing of the Florida Bar and is currently in private practice in Ft. Lauderdale, Florida.
- 5. I have found Mr. Gaffigan to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move the admission of Stephen M. Gaffigan, pro hac vice.
- 7. I respectfully submit a proposed order granting the admission of Stephen M. Gaffigan, pro hac vice, to the Court.

WHEREFORE it is respectfully requested that the motion to admit Stephen M. Gaffigan, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: 12/11/07

Respectfully submitted,

in Macaluso (JM 2058)

Gibney, Anthony & Flaherty, LLP

65 Fifth Avenue New York, NY 10022

Telephone: (212) 688-5151 Facsimile: (212) 688-8315

E-mail: jmacaluso@gibney.com

Sworn to before me this

day of December, 2007

BAMAWATTI LALL
Notary Public, State of New York
No. 01LA6034961
Qualified in Queens County
Commission Expires December 20, 20

GIBNEY, ANTHONY & FLAHERTY, LLP John Macaluso (JM 2058) 665 Fifth Avenue New York, New York 10022 Telephone: (212) 688-5151

Facsimile: (212) 688-8315 E-mail: jmacaluso@gibney.com

OF COUNSEL: Stephen M. Gaffigan STEPHEN GAFFIGAN, P.A. 312 Southeast 17th Street, 2nd Floor Ft. Lauderdale, FL 33316

Telephone: (954) 767-4819 Facsimile: (954) 767-4821 E-mail: stephen@smgpa.net

Attorneys for Plaintiff CHANEL, INC.

THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

) CASE NO. 07 CV 6057 (NRB)
)
ORDER FOR ADMISSION TO PRACTICE PRO HAC VICE
)))))
))))

The motion for admission to practice pro hac vice in the above captioned matter is granted. The admitted attorney **Stephen M. Gaffigan** is permitted to argue or try this particular case in whole or in part as counsel or advocate.

An attorney admitted to practice pro hac vice is required to pay a \$25.00 attorney admission fee and present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms your appearance as counsel in this case, and it will be entered on the Court's docket. A notation of your admission pro hac vice for the above listed case will be made on the roll of attorneys.

The attorney admitted pro hac vice must serve a copy of this Order on all other counsel in this case.

Dated: December _	, 2007		

United States District Judge

CERTIFICATE OF SERVICE

Re: Chanel, Inc. v. Brigitte C. Vaugh, et al. 07 CV 6057 (NRB

Tina Ferraioli, under the penalty of perjury, states as follows:

I am over 18 years of age, not a party to the within action, and work in New York, New York.

On December 11, 2007, I served a copy of the Notice of Motion to Admit Counsel Pro Hac Vice, Affidavit of Stephen M. Gaffigan in Support of Motion to Admit Counsel Pro Hac Vice, Certificate of Good Standing for Stephen M. Gaffigan, Affidavit of John Macaluso in Support of Motion to Admit Counsel Stephen M. Gaffigan and Order For Admission to Practice Pro Hac Vice in the above-referenced action upon Carl E. Person, attorney for the defendant, by mailing a true copy of the same in a postage prepaid envelope and depositing the same in a post office or official depository of the United States Postal service within the State of New York to the last known address of Carl E. Person.

TO: Carl E. Person 325 W. 45th Street Suite 201 New York, NY 10036

Tina Ferraioli (